

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

*v.*

DAWUAN NA’JEE WILLIAMS

Criminal Indictment

No. 1:21-CR-310-SDG-LTW

THE GRAND JURY CHARGES THAT:

**Counts One through Five**  
**(False Statement to a Licensed Firearms Dealer – 18 U.S.C. § 922(a)(6))**

On or about the dates listed below, in the Northern District of Georgia, the defendant, DAWUAN NA’JEE WILLIAMS, did knowingly furnish and exhibit a false, fictitious, and misrepresented identification, and did make a false and fictitious written statement, to a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of at least one of the corresponding firearms described below, said identification and statement being intended and likely to deceive the licensed dealer as to a fact material to the lawfulness of the sale of said firearm(s), that is:

Count	Date	Licensed Dealer	Firearm(s)
1	10/19/2020	Autrey’s Armory, Inc.	<ul style="list-style-type: none"> <li>one (1) Ruger LC9S 9mm semiautomatic pistol</li> <li>one (1) Glock 19 9mm semiautomatic pistol</li> </ul>
2	5/10/2021	Range, Guns and Safes LLC	<ul style="list-style-type: none"> <li>one (1) Smith &amp; Wesson M&amp;P 380 Shield .380 caliber semiautomatic pistol</li> </ul>

Count	Date	Licensed Dealer	Firearm(s)
3	5/21/2021	Moss Pawn LLC	<ul style="list-style-type: none"> <li>• one (1) Glock 17 9mm semiautomatic pistol</li> <li>• one (1) Bearman Industries .38 Special caliber derringer</li> <li>• one (1) Glock 19 9mm semiautomatic pistol</li> <li>• one (1) Derya Arms VRPA40 12-gauge shotgun</li> <li>• one (1) SCCY Industries CPX-2 9mm semiautomatic pistol</li> <li>• one (1) Smith &amp; Wesson M&amp;P 9 Shield 9mm semiautomatic pistol</li> </ul>
4	5/26/2021	Georgia Firearms Holding Company, LLC d/b/a Gun Commanders	<ul style="list-style-type: none"> <li>• one (1) Ruger-57 5.7x28mm semiautomatic pistol</li> <li>• one (1) Glock 19 9mm semiautomatic pistol</li> <li>• one (1) Smith &amp; Wesson M&amp;P 15 5.56mm semiautomatic pistol</li> </ul>
5	6/6/2021	Georgia Firearms Holding Company, LLC d/b/a Gun Commanders	<ul style="list-style-type: none"> <li>• one (1) Ruger-57 5.7x28mm semiautomatic pistol</li> <li>• one (1) Taurus G2C 9mm semiautomatic pistol</li> </ul>

in that the defendant presented a false Georgia identification card bearing the name of “K.E.C.,” whose identity is known to the Grand Jury, and falsely represented himself to be “K.E.C.,” when, in fact, as the defendant then well knew, he was not “K.E.C.”

All in violation of Title 18, United States Code, Section 922(a)(6).

**Counts Six through Ten**  
**(Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1))**

On or about the dates listed below, in the Northern District of Georgia, the defendant, DAWUAN NA’JEE WILLIAMS, did knowingly possess and use, without lawful authority, a means of identification of another person, that is, the name of “K.E.C.,” an actual person whose identity is known to the Grand Jury, during and in relation to the felony violations listed below:

<b>Count</b>	<b>Date</b>	<b>Felony Violation</b>
6	10/19/2020	False Statement to a Licensed Firearms Dealer as alleged in Count 1 of this Indictment
7	5/10/2021	False Statement to a Licensed Firearms Dealer as alleged in Count 2 of this Indictment
8	5/21/2021	False Statement to a Licensed Firearms Dealer as alleged in Count 3 of this Indictment
9	5/26/2021	False Statement to a Licensed Firearms Dealer as alleged in Count 4 of this Indictment
10	6/6/2021	False Statement to a Licensed Firearms Dealer as alleged in Count 5 of this Indictment

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**Count Eleven**  
**(Possession of a Firearm by a Prohibited Person – 18 U.S.C. § 922(g)(1))**

On or about July 22, 2021, in the Northern District of Georgia, the defendant, DAWUAN NA’JEE WILLIAMS, knowing that he had been previously convicted of at least one of the following offenses:

- Terroristic Threats, on or about June 13, 2000, in the Superior Court of Essex County (New Jersey);

- Burglary, on or about November 30, 2006, in the Circuit Court of Leon County (Florida);
- Robbery, on or about January 28, 2014, in the Circuit Court of Leon County (Florida);
- Criminal Use of Personal Identification Information, on or about January 28, 2014, in the Circuit Court of Leon County (Florida);
- Home-Invasion Robbery, on or about March 1, 2018, in the Circuit Court of Gadsden County (Florida);
- Kidnapping, on or about March 1, 2018, in the Circuit Court of Gadsden County (Florida); and
- Aggravated Battery, on or about March 1, 2018, in the Circuit Court of Gadsden County (Florida),

each of the aforesaid convictions being for a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, at least one of the following firearms:

- one (1) Ruger LC9S 9mm semiautomatic pistol;
- one (1) Smith & Wesson M&P 380 Shield .380 caliber semiautomatic pistol;
- one (1) Ruger-57 5.7x28mm semiautomatic pistol; and
- one (1) Smith & Wesson M&P 15 5.56mm semiautomatic pistol,

all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)

#### **Forfeiture Provision**

Upon conviction of one or more of the offenses alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all

firearms and ammunition involved in the commission of the offenses(s), including but not limited to the firearms listed in the Counts above.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

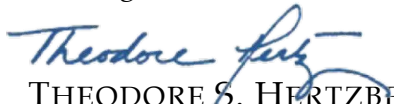
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the forfeitable property, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

A \_\_\_\_\_ BILL

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FOREPERSON

KURT R. ERSKINE  
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